

1 In the pending cases, the completion date is not filled out on the order status  
2 report.

3 Ameritech further argues that a due date requested before an order is  
4 received cannot be met. I agree. Ameritech explained that an order is only  
5 rejected for a competing carrier's (CLEC) faulty entered and therefore the  
6 CLEC should not expect that due date to be maintained if it needs to resubmit  
7 the order. Ameritech pointed out that many times it is able to follow up and  
8 obtain input needed and still process the order. Ameritech showed me how the  
9 explanation of why an order is processed manually can be used to determine if  
10 the manual processing was due to lack of CLEC input or an Ameritech  
11 decision to process the transaction manually. However, this information was  
12 input by AIIS CSreps manually and Ameritech could not sort the orders on this  
13 basis.

14 I then determined that the analysis that was needed was to determine if  
15 manual transactions due to Ameritech's needs **and** not through any input  
16 deficiency by the CLEC are more or less likely to miss a due date than  
17 automatically processed transactions. This required me to manually enter each  
18 transaction on the order status report into a spreadsheet where I could then sort  
19 the orders into the above described categories.

20 Q. Please summarize the results of your study.

21 A. I found that transactions processed manually due to Ameritech reasons had  
22 <sup>4</sup>4 missed due dates and 179 achieved due dates while automatic transactions  
23 had 11 missed due dates and 161 achieved due dates. Statistical analysis  
24 shows there is a less than .01 percent change that such a difference would  
25 occur by chance alone. The "t" statistic is 56. Statistically this is considered

1 significant. While I stand by my classifications, I also did the sensitivity test  
2 of removing all due dates resulting from "in error" and "23" messages. With  
3 that data, the probability is still less than 5 percent that the resulting difference  
4 would occur by chance alone. The "t" statistic is ~~1.94~~ 11.28

5 I looked at the most recent three weeks to see if this problem was still  
6 reflected in more current data. I found that, in this time period, transactions  
7 processed manually due to Ameritech reasons had 17 missed due dates and  
8 123 achieved due dates while automatic transactions had 1 missed due date and  
9 74 achieved due dates. Again, statistical analysis shows there is a less than  
10 .01 percent change that such a difference would occur by chance alone.  
11 Statistically this is considered still significant. The "t" statistic is 38.6.  
12 Again, the sensitivity analysis of removing all missed due dates resulting from  
13 "in error" and "23" messages gives a probability of less than .01 percent  
14 chance the difference would occur by chance alone. The "t" statistic is 9.7.  
15 Ameritech's manually processed transactions are more likely to miss their due  
16 date than automatically processed transactions. This service is not in parity  
17 with the service provide to Ameritech's CSreps.

18 I also performed analysis with this data set which shows considerable  
19 improvement over time in Ameritech's ability to automatically instead of  
20 manually process transactions. In Exhibit 2b (AWW-1, Schedule 1,  
21 Page 1), I show week by week the frequency of transactions completed  
22 electronically and those processed manually due Ameritech needs. This shows  
23 that while for the week ending February 8, 1997, Ameritech processed 117  
24 transactions manually due to its own needs and only 15 electronically, in the  
25 week ending February 22, 1997, Ameritech processed 49 manually due to its

1 own needs and 98 electronically. As Ameritech processes more and more  
2 volume electronically, the difference between electronic and manual processing  
3 will be less of a concern.

4 In Exhibit De (AWW-1, Schedule 1, Page 2), I show the frequency  
5 of processing errors that lead to manual processing. It is still of great concern  
6 that in week 7 there are 45, 20, and 26 of "1P," "timed out waiting for CSR,"  
7 and Code-type errors respectively. A "1P" message results when one step in  
8 the interface program puts in a value that cannot be accepted in the next step  
9 of the program. The "1P" type errors help programmers find areas where  
10 corrections are needed in the program. While not all of these resulted in  
11 missed due dates, it is demonstrative that the interface program still has bugs  
12 to work out. The ordering interface should be monitored for the continued  
13 frequency of these types of errors. I have included a description of my data  
14 coding decisions for this analysis as Exhibit De (AWW-1, Schedule 3).

15 Q. Please describe your review of trouble logs for the ordering interface.

16 A. The trouble log was dated February 26, 1997, and included troubles from  
17 January 9, 1997, to February 12, 1997. The troubles were rated from "1" to  
18 "5" with the highest priority troubles rated "1." I entered information for each  
19 trouble report into a spreadsheet, recording the original date of the trouble, the  
20 priority and the days to clear. Ameritech provided the expected time to  
21 process each priority of trouble. Priority 1 troubles are expected to be cleared  
22 in 4 hours; priority 2 are to be cleared in 5 days; and priority 3 and 4 in  
23 60 days. I determined based on the completion date whether Ameritech had  
24 met its own closing requirement for each of the ordering troubles on the log.  
25 The raw data is presented in Exhibit De (AWW-1, Schedule 2, Pages 4-5).

(The data is display graphically on Pages 1-3.) What I notice is priority 1 troubles did not occur in the first four weeks studied, January 11, 1997, to February 1, 1997, but did occur in the last three weeks studied, February 8-22, 1997. Three priority 1 troubles were cleared within the expected time period, and three exceeded the 1 day limit by three, five and six days. The priority 1 troubles take place as transaction volumes rapidly increase in the week of February 8, 1997. Priority 2 troubles decline over the studied period while priority 3 troubles rise. In the last week studied only one trouble was not cleared within the expected closing date.

Q. Please describe your evaluation of test cases and integration testing.

A. Ameritech reports that it ran 4453 test cases between January 1, 1996, and February 1, 1997. The "Order Status Report" for that time period appears large enough to include that volume of test cases. Test scripts of the test scenarios run were provided. I could follow the ID on the test script into the order status report. Throughout 1996, additional resale products were processed by the electronic ordering interface. Ameritech provided a "Test Execution Matrix" summarizing the tests run between December 30, 1996, to January 17, 1997, which described expected results and actual results. I noticed that some test scripts required processing two, three and up to four times before the expected result was achieved. Only one test case was run for an unbundled network element. All the other testing was of resold services. My impression is that while a great degree of testing has been carried out, in part, the magnitude of testing necessary reflects the numerous difficulties that needed to be overcome. It is a concern that only one test case has been run for unbundled network elements. I further discuss this issue in my evaluation

1 of the billing interface below. There I explain why I believe more work is  
2 necessary before the unbundled network elements would be considered  
3 available to purchase.

4 Ameritech provided the results of integration testing that was carried  
5 out between January and April 1996. These documents are marked as  
6 Item \_\_\_\_ in this proceeding. From reviewing these results, I cannot tell if  
7 the integration testing was complete or successful. The purpose of integration  
8 testing is to test the complete ordering process from start to finish. This  
9 documents the receipt of the order, the creation of proper files, the matching  
10 with billing data and the proper issuing of bills. In the tables of expected  
11 results there are many pages with no entry in the "Y/N" column to reflect if  
12 the expected results are achieved.

13 I read numerous explanatory statements say, "The order did not bill  
14 correctly;" "Error 624VF...The same error was found in integration  
15 testing...Error can not be corrected until fix applied." More examples of error  
16 messages will be discussed in the billing interface review below. Where a  
17 result was not satisfactory, I cannot follow the data through to see if a later  
18 test resolved the difficulty. The summary tables have many blank pages where  
19 neither "Y" or "N" is recorded next to the expected results.

20 Q. Please describe the evidence reviewed regarding the provisioning aspects of the  
21 ordering interface.

22 A. Ameritech provided that the ordering interface includes the following EDI  
23 transaction sets related to order provisioning.

24	Acknowledgement of a Received Order	997
25	Acknowledgement of a Changed Order	997
26	Firm Order Confirmation - Service Request	855

1	Firm Order Confirmation - Change	865
2	Completion Notification	865
3	Order Status Report	870

4           The "Order Status Report" described earlier that listed the 1338 transactions,  
5           includes a column for "Transaction Code/Date Sent" which shows the 855 and  
6           865 transaction sets were sent. For the 997 transaction set, Ameritech  
7           provided test orders that were run under the company name "Transware"  
8           which is a fictitious entity that Ameritech uses to process test orders. I saw  
9           the purchase order acknowledgements returned for some of these orders. I  
10          have not seen the 870 transaction set as fictitious orders have not been  
11          completed or delayed. No competing carriers are set up to receive this last  
12          transaction set yet, but there is no reason to believe this transaction set will not  
13          function properly.

14       Q.    Please describe your review of the ASR interface for ordering unbundled  
15              loops.

16       A.    Ameritech reports having processed 31,761 orders for unbundled loops and  
17              4,499 disconnects of unbundled loops through the ASR interface. Ameritech  
18              reports three competing providers using the ASR interface for ordering  
19              unbundled loops. The ASR interface is the same interface that is used for  
20              processing access services to interexchange carriers. I reviewed a report of  
21              the unbundled loops ordered from January 7-31, 1997. The report showed the  
22              date received, time received, date confirmed, time confirmed, desired due  
23              date, actual due date and ASR order number. The quantities of loops reported  
24              there appeared consistent with the overall quantities reported by Ameritech. I  
25              was not able to evaluate whether due dates were met since that information  
26              was not on this report. As there is no comparable service for Ameritech to

1 unbundled loops, Ameritech has established performance criteria instead of  
2 parity criteria for unbundled loops. The prior history of the interface and the  
3 volume of processed orders support my conclusion that the interface appears  
4 functional.

5 Q. Please describe your review of testimonials.

6 A. USN Communications reports that it is using the EDI ordering and  
7 provisioning interface to support sales efforts in Illinois, Ohio and Michigan.  
8 They have found the interface has been refined over time to expand the  
9 applicable service types.

10 Network Recovery Services reports they are in full production for  
11 ordering using the EDI interface. It receives order acknowledgment messages  
12 which vary in the extent of content provided. I asked Ameritech about this  
13 report. Ameritech explained that orders submitted by fax have less data  
14 transferred so the acknowledgement has less detail than electronically submitted  
15 orders. This seems like a reasonable explanation. Network Recovery Services  
16 reports that it is not set up yet to receive the final order confirmation and still  
17 uses a manual review process.

18 Ameritech hired a communications consultant, Muriel L. McLemore to  
19 evaluate the EDI automatic order processing system. She reported seeing  
20 evidence of customer misunderstanding in repeat input errors. However,  
21 beginning February 18, 1997, significant improvement was made in the  
22 acceptance of orders through the automatic process. She described this as  
23 typical of the learning curve with automated interfaces.

24 Q. Please summarize the results of your work on the ordering/provisioning  
25 interface.

1       A.     While significant improvement has been seen for the EDI interface in the last  
2             week reviewed in February, there is still concern whether the interface is  
3             prepared for the volumes of transactions it will need to handle. The last week  
4             in February continues to show error messages of 1P, pending, code type errors  
5             and timed out waiting for CSR. Ameritech has not been able to clear all  
6             troubles within its stated expected time period although this has shown  
7             improvements. Such error messages reflect difficulty on the Ameritech side of  
8             the interface and lead to manual processing of orders which are more likely to  
9             receive a missed due date than manual orders. Improvement will be needed in  
10            this area before this interface can be considered to be tested and operational.

11       **Repair and Maintenance Interface**

12       Q.     Please describe your evaluation of the repair and maintenance interface.

13       A.     At this time, no provider is actually using this interface. Therefore, it is  
14             difficult to determine from the information provided to staff, that it will  
15             function as expected once it is used. Nonetheless, I reviewed records of test  
16             cases, descriptions of the interface, and information provided by USN  
17             Communications.

18       Q.     Please describe your evaluation.

19       A.     Ameritech describes that the repair and maintenance interface is the same  
20             interface that is used for reports troubles for access services like interoffice  
21             transport. It was modified to handled troubles for unbundled local loops.  
22             Ameritech reports that due to the expense of getting set up to use the interface,  
23             no competing provider is using the interface. This is confirmed by USN  
24             Communications that states it is too costly for that company to implement the  
25             trouble reporting due to the low volumes of trouble to report. Manual



1 interaction has been satisfactory to USN Communications. Ameritech  
2 estimates that it will cost between \$300,000 to \$600,000 for a competing  
3 provider to implement the interface. Ameritech is considering providing a  
4 graphical program to interact with this interface but is not doing so at this  
5 time.

6 Ameritech indicates that it has run 145 test cases. Ameritech provided  
7 samples of the test scripts. I could not follow these test cases into any status  
8 report of transactions processed. I requested documentation to follow dispatch  
9 messages into a dispatch report. But such documentation was not available. I  
10 can't tell if service will be provided to competing providers in parity with the  
11 service provided to Ameritech customers.

## 12 **Billing Interface**

13 Q. What is your conclusion regarding the billing interface?

14 A. The billing interface is working for resold services, however, more work is  
15 needed before the platform of unbundled network elements can be ordered and  
16 billed correctly. In addition, before the Commission can advise the FCC on  
17 271 issues, the provision of the data needed to bill access when unbundled  
18 switching is purchased with common transport will need to be worked out. I  
19 have reviewed descriptions of the billing systems, bills to competing providers,  
20 integration testing and testimonials.

21 Q. Please describe your evaluation.

22 A. Ameritech reports that six competing providers are using the electronic billing  
23 interface. Ameritech reports that 4,858,021 minutes of interoffice use and  
24 4,186,400 minutes of local use have been resold and billed. In addition, 420  
25 residential customers and 17,651 business customers monthly resold service

1 charges have been billed and 22,625 monthly customers monthly charges have  
2 been billed for unbundled loops. Testimonials were received from USN  
3 Communications and Network Recovery Services. USN Communications  
4 reports that the electronic interface is the basis for the bulk of its customer  
5 billing. I do believe CLECs would have complained to the Commission had  
6 they not been able to bill their own customers. To my knowledge, the  
7 Commission has not received any such complaints.

8 Billing data for current customers by design cannot be accessed. It is  
9 created in a downloadable file that only that provider has access to. Once the  
10 file is downloaded, it is gone. It is in the hands of the competing provider. It  
11 is understandable that it is difficult to provide Commission staff the ability to  
12 review this information.

13 I have provided the following suggestion. A fictitious entity like  
14 Transware described above could be billed for some services and then  
15 Ameritech could download that data for staff review to evaluate the billing of  
16 unbundled network elements.

17 My concerns in the billing of unbundled network elements stems from  
18 the review of integration testing performed for resale services between January  
19 and April 1996. Numerous billing problems were encountered and corrected  
20 for resale services. The following is a sampling of the error messages noted  
21 there:

22 No billing data exists  
23 R08 did not bill correctly  
24 Did not bill in February  
25 March invoice did not include the correct fractional charges.  
26 No LI charges, should be 17.50 x 2  
27 The OC7C credits were incorrectly based on the reseller bill date.  
28 Disconnect credits bill OK, but recurring charges continue to bill.

1 Noted discrepancies between these rates and USOC review.  
2 Fractional charges used 44 instead of 45 days.  
3 Charges billed correctly except the IC charge for RCA billed as a F  
4 charge type instead of a N charge type.  
5 The D order should have stopped the billing of the recurring charges.  
6 The SI charge for RCF did not bill.  
7 Credits processed from D order but the recurring charges for bill  
8 period 3/19 thru 4/18 also billed.  
9 These USOCs were grouped with the recurring charges and shown as  
10 charge type L instead of N.  
11 ACIS file is not correctly passing frac. charges...

12 My concern is that the Universal Service Ordering Codes (USOCs) for  
13 unbundled network elements (UNEs) have not been developed yet. Which  
14 elements will need to be purchased together to form an unbundled platform is  
15 still a subject of debate. The three platforms offered by Ameritech in its  
16 Statement of Generally Available Terms (SGAT) have not had USOCs created  
17 yet. A single USOC will define recurring charges, nonrecurring charges,  
18 usage charges associated with that rebundled offering. I have prepared  
19 Exhibit   Jc   (AWW-1, Schedule 4) to show the combination of rate elements  
20 that Ameritech's SGAT require for each of three possible unbundled network  
21 element platforms offered in the SGAT. The list of rate elements is extensive  
22 for each platform. This will need to have similar testing performed as resale  
23 services did in order to ensure that billing will be correct. I do not believe  
24 UNEs are available to be purchased until after the USOCs have been defined  
25 and tested. The Commission should provide some oversight of bill testing for  
26 UNE before it is considered to be generally available.

27 Another issue is the source of the data needed to bill access to  
28 interexchange carriers. For the SGAT review, Ameritech has only provided  
29 UNE platforms that provide access to interexchange providers through  
30 dedicated ports and transport. As will be discussed later in this hearing, the

1 Commission has determined that Ameritech must offer common transport  
2 which would not require dedicated ports. By requiring dedicated ports,  
3 Ameritech asserts that competing providers will be able to obtain the  
4 information needed to bill access from other sources. So the source of the  
5 data is not an issue for the services being offered. However, to carry out the  
6 Commission decision that common transport could be a component of a UNE  
7 platform, the issue of the source of billing data will need to be addressed. A  
8 method has not been developed yet to provide that billing data.

9 Q. Please summarize your conclusions regarding Ameritech's OSS interfaces.

10 A. **Preordering interface:** My conclusion at this time is that there is not enough  
11 hard data or unbiased opinion to determine if this interface is processing  
12 transactions at parity with Ameritech. No data was available to compare  
13 CLECs response time to Ameritech CSreps' response time.

14 **Ordering/provisioning interface:** My conclusion at this time is that  
15 while the EDI interface for ordering resale and unbundled elements (except  
16 loops) processes transactions, it is not yet stable. Therefore, it does not  
17 provide service that is equal between Ameritech and competing LECs.  
18 Moreover, additional work is necessary before many of these elements can be  
19 ordered through the EDI interface. The ASR interface for ordering unbundled  
20 loops appears to be functioning.

21 **Repair and maintenance interface:** At this time, no provider is  
22 actually using this interface. Therefore, it is difficult to determine from the  
23 information provided to staff, that it will function as expected once it is used.

24 **Billing interface:** The billing interface is working for resold services,  
25 however, more work is needed before the platform of unbundled network

1 elements can be ordered and billed correctly. In addition, before the  
2 Commission can advise the FCC on 271 issues, the provision of the data  
3 needed to bill access when unbundled switching is purchased with common  
4 transport will need to be worked out.

5 Q. Does that conclude your testimony on Ameritech's OSS interfaces.

6 Y. Yes it does.

7 AWW:lep:h:\ss\testimon\osstest.397

1 MR. KELLEY: The witness is tendered for  
2 cross-examination.

3 EXAMINER JAMES: Do we have anyone who  
4 wishes to ask Ms. Wiecki any questions?

5 MR. DAWSON: We have no questions.

6 EXAMINER JAMES: Mr. Gardon's hand went  
7 up first I think.

8 Cross-Examination

9 By Mr. Gardon:

10 Q. Ms. Wiecki, you've described in response to some  
11 questions from Mr. Kelley about your disagreements  
12 with Mr. Rogers; is that correct?

13 A. That's correct.

14 Q. I direct your attention to pages 19 and 20 of your  
15 testimony, starting with about line 9 on page 19,  
16 I just want to ask you this. Having sat through  
17 these two days of testimony, have you heard  
18 anything which causes you to change the  
19 conclusions that you have stated on pages 19 and  
20 20 when you summarized your testimony regarding  
21 Ameritech's OSS?

22 A. My opinion is still the same, that I have heard  
23 from Sprint that it should take between 5 and 10  
24 seconds. I have my own data that Ameritech's  
25 average response time was 13.4 to the new

1 entrants, and I've heard that there is, I've seen  
2 no comparison for Ameritech's customer service  
3 reps how rapidly they get their answer. So I'm  
4 still concerned about the parity between the  
5 competing LEC's response time and Ameritech's  
6 customer service rep's response time.

7 Q. And with respect, and I don't want to limit this  
8 question at all just to the preordering interface,  
9 but with respect to all of the other interfaces  
10 that you described there and the conclusions that  
11 you've talked about, based upon what you've heard  
12 in the last couple of days, is there any reason  
13 for you to change the conclusions you've indicated  
14 on pages 19 and 20?

15 A. I've learned a lot during the hearing process. I  
16 don't know quickly if I can think of everything  
17 that's a little different. On the provisioning I  
18 had earlier said I couldn't find anything that I  
19 was -- was demonstratively wrong about the firm  
20 order confirmations, but I've heard a lot more in  
21 the last two days about the order confirmation,  
22 that gives me some doubt on that.

23 On the ASR interface and some of the  
24 discussion about using ASR and is it the standard  
25 and shouldn't EDI be used, from what I understand

1 on the ASR is that it doesn't give a confirmation  
2 whereas the EDI processes do. So I don't know if  
3 that's enough to warrant wanting the ASR standard  
4 not to be used or not. But I've learned that  
5 during the hearing process. I've learned a lot  
6 more about billing during the hearing process, so  
7 it's raised some questions about billing that I  
8 hadn't identified in the past.

9 As far as things that I did identify, if  
10 I've changed my mind on them, I feel the same way  
11 about repairs and maintenance that I haven't seen  
12 evidence of it being used, and I just can't tell.  
13 I feel the same in regard to ordering about due  
14 dates met that I think my analysis demonstrates  
15 that they're more likely to miss a due date if  
16 it's processed manually and that therefore, I  
17 think manual transactions are of a concern and  
18 that there are still error messages on the  
19 Ameritech side of the interface in regard to 1-Ps  
20 and timed out for CSRs and messages of that kind  
21 that lead to manual processing that there is still  
22 things that are happening that lead to manual  
23 processing. And my analysis that due dates are  
24 more likely to be missed if it's manually  
25 processed rebuts the concept of no one should



1 complain as long as their due date is kept, you  
2 know, I don't think that we -- I think we have  
3 evidence that they're more likely to miss their  
4 due date.

5 My concern still remains about defining  
6 all the USOCs for billing with the unbundled  
7 network elements, that they haven't been defined  
8 yet and that clearly it's a difficult process  
9 defining it, that there is a lot of information  
10 that has to pass back and forth and that it has to  
11 be carried through to the billing system, that the  
12 USOCs then are giving the correct billing  
13 results. So that still remains a concern on my  
14 part.

15 Q. One last question just directing your attention to  
16 page 19, lines 14 through 16. There again you're  
17 talking about the ordering provisioning interface,  
18 do you see that?

19 A. Yes.

20 Q. You drawn a conclusion that while the EDI  
21 interface for ordering resale and unbundled  
22 elements processes transactions, it is not yet  
23 stabile; is that correct?

24 A. Right.

25 Q. And you continue to have that opinion; is that

1 right?

2 A. Right, I did.

3 MR. GARDON: That's all the questions I  
4 have.

5 EXAMINER JAMES: Mr. Hughes.

6 Cross-Examination

7 By Mr. Hughes:

8 Q. Just a couple. Ms. Wiecki, how long have you been  
9 working on the question of the adequacy of  
10 Ameritech's OSS systems?

11 A. Well, the commission originally had directed staff  
12 to try to develop a plan in regard to how we would  
13 test it. I'm trying to think of the dates of when  
14 that was. So initially we were looking toward  
15 could there be a third party. The result from  
16 that was then a memo back to the commission  
17 recommending that it be an issue in this hearing.  
18 So I mean between the date the commission made  
19 that decision which I can't remember exactly when  
20 it was, it has to be after March 3rd because  
21 that's when they filed their SGAT. So between  
22 March 3rd and now we were either trying to figure  
23 out how we might give the commission advice and  
24 then 2, when it was going to be in this hearing,  
25 then doing everything that staff felt that we were

1           capable of to provide advice to the commission.

2       Q.    Let me back up a little if I may.  When did  
3           Ameritech originally file its SGAT?

4       A.    It was back in September I believe.

5       Q.    Did you get involved in the investigation back  
6           last fall?

7       A.    Yes.  Our initial recommendation was just that the  
8           commission should determine that it's tested and  
9           operational.  So when we had looked at the review,  
10          we had identified that the operation support  
11          systems needed to be tested and operational.  And  
12          then the commission then put out the order in  
13          December that that was going to be a requirement  
14          for SGAT approval.

15      Q.    And you've reviewed all those voluminous data  
16          responses that Ameritech provided?

17      A.    They are all mine -- not all of mine but a large  
18          portion of them were my data requests, right.

19      Q.    Has this general responsibility of yours taken up  
20          a considerable amount of your work time from last  
21          fall until now?

22      A.    Yes, the whole SGAT compliance and in particular  
23          OSS I think in the last three or four weeks I've  
24          devoted 100 percent of my time to working on that  
25          and trying to get as much information as I could

1 to the commission for this hearing.

2 MR. HUGHES: That's all I have. Thanks.

3 EXAMINER JAMES: Anyone else?

4 (No response.)

5 EXAMINER JAMES: Mr. Kelley, redirect?

6 MR. KELLEY: No.

7 CHAIRMAN PARRINO: I have questions.

8 EXAMINER JAMES: Chairman has some  
9 questions.

10 Examination

11 By Chairman Parrino:

12 Q. Ms. Wiecki, on page 7 of your direct testimony,  
13 actually it begins at the bottom of page 6, you're  
14 talking about the EDI interface for ordering  
15 resold services and unbundled elements. You make  
16 a statement that it's not yet stabile. Could you  
17 give me a definition of what stabile would mean to  
18 you?

19 A. I was trying to think of criteria that the  
20 commission could use. And one was that if  
21 Ameritech says that they're going to clear a  
22 priority 1 response in four hours, you know, the  
23 report is accurate enough to one day, that you  
24 would like to see troubles cleared within the time  
25 periods that they state is required. So that was

1 -- I was trying to go through the large amount of  
2 data that we had and apply some kind of criteria.

3 The other concern that I would have is  
4 the error messages on the Ameritech side of the  
5 interface. And I don't know what would be an  
6 acceptable number of error messages or kinds of  
7 error messages. I think that if there wasn't the  
8 problem of manual transactions being more likely  
9 to miss a due date, the error messages wouldn't be  
10 as much -- as much of a concern to me. But with  
11 the difference then seeing a reduced number of  
12 those error messages.

13 In my exhibit which in the Exhibit 26,  
14 actually it's the second page of schedule 1, what  
15 I show there is the frequency of error messages  
16 over time. So the 1-P kind of processing errors,  
17 there was a big spike of them in February, the  
18 week ending February 8th. And then by the week  
19 ending February 22nd there is still 50 of them,  
20 close to 50 of those error messages. So I'm  
21 concerned about the quantity of error messages.

22 Q. One more question. On the bottom of page 7 lines  
23 23 through 25 I just want to make sure I  
24 understand what you're saying. The way I  
25 interpret that is that because Ameritech does not

1 count an order that has not been completed, there  
2 is an underestimation of the due dates missed?

3 A. Under reporting I would say.

4 Q. Under reporting. Thank you.

5 EXAMINER JAMES: Anything else of this  
6 witness?

7 (No response.)

8 EXAMINER JAMES: You're temporarily  
9 excused.

10 (Witness excused.)

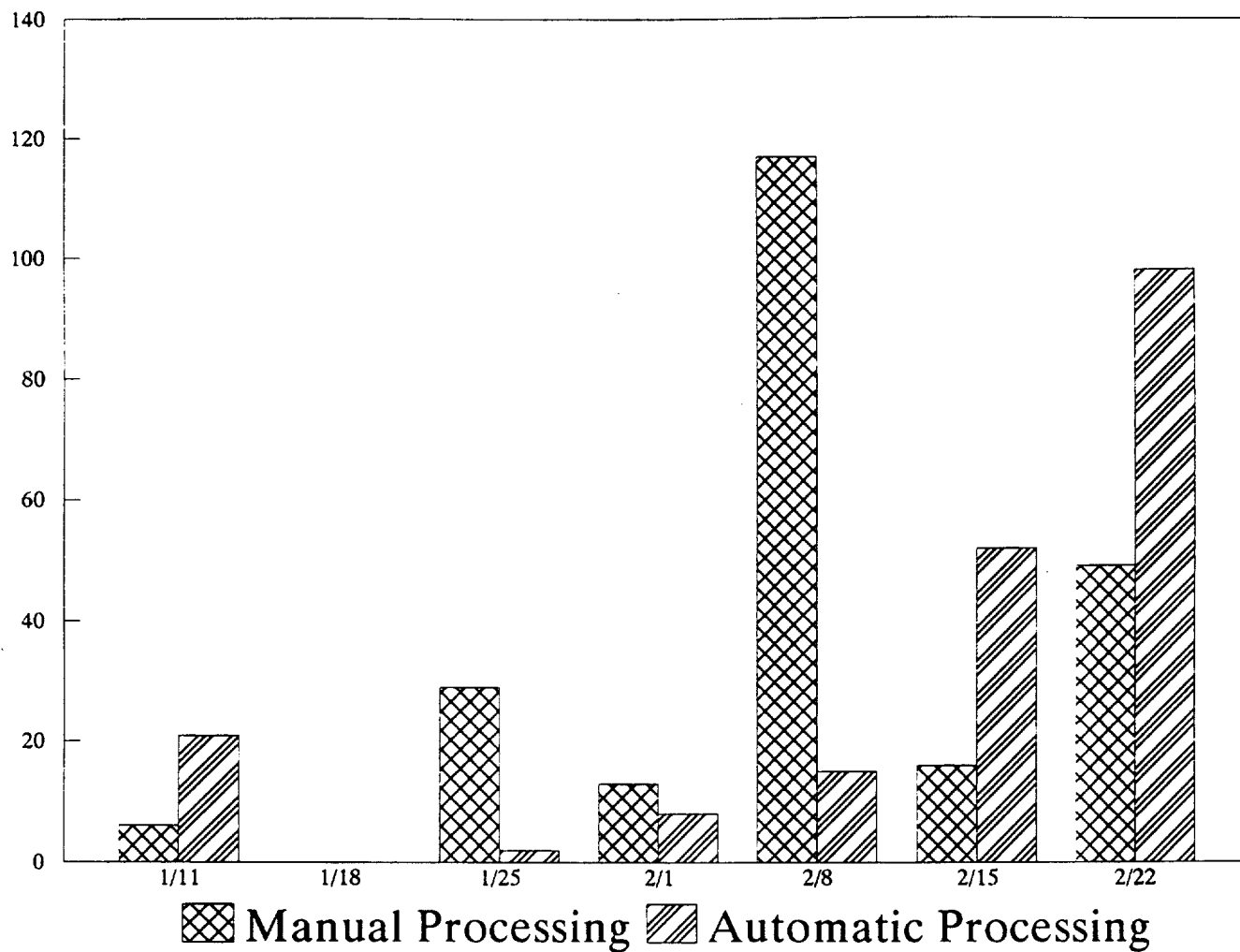
11 EXAMINER JAMES: Off the record.

12 (Discussion off the record.)

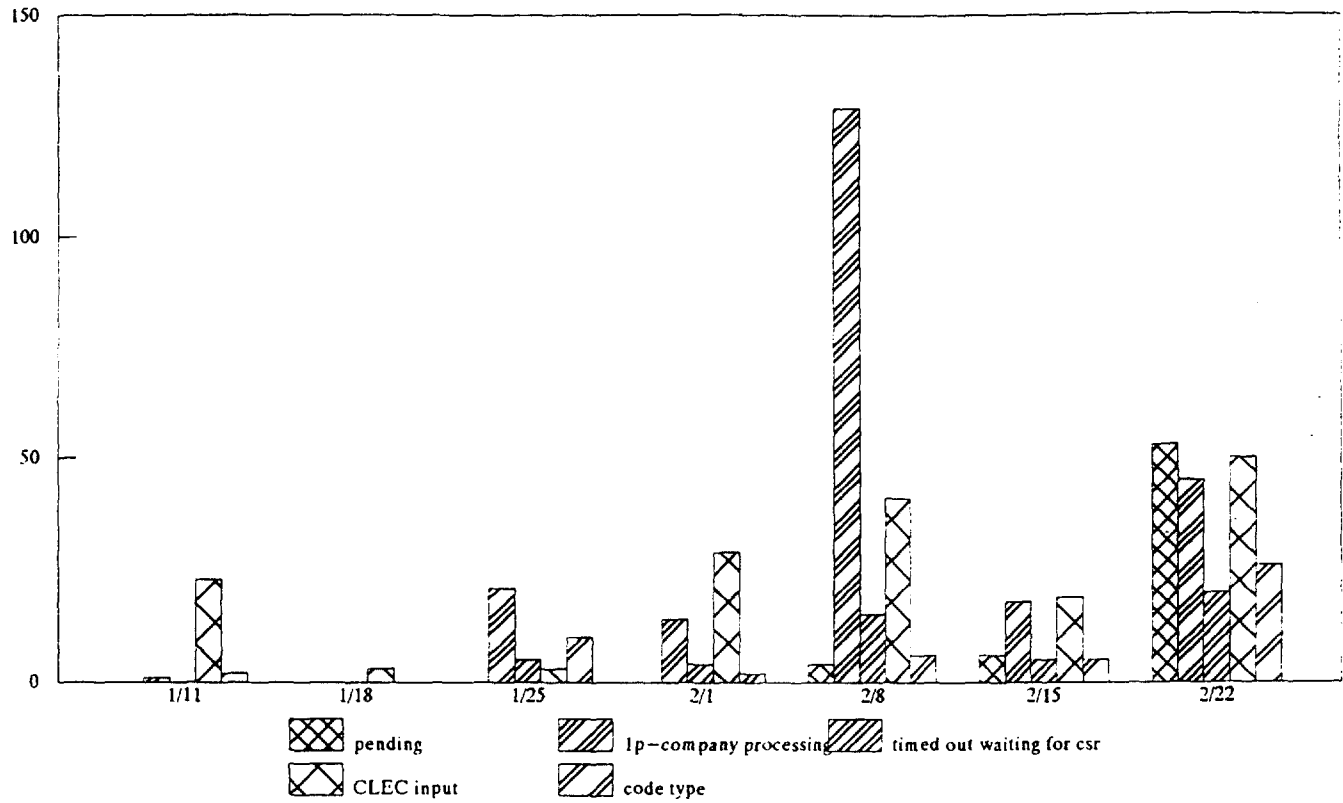
13 EXAMINER JAMES: Back on the record.

14 While we were off the record we established that  
15 the OSS portion of this hearing record is finished  
16 and that the commission will sit for oral argument  
17 on the OSS portion of this docket tomorrow morning  
18 at 9:00 and that the time will be divided so that  
19 Ameritech has half an hour which it may split  
20 between direct argument and any rebuttal that it  
21 wants to make. MCI, Sprint, AT&T and Time-Warner  
22 will split an hour among them to suit themselves.  
23 Come in in the morning and tell me how long each  
24 of you is intending to speak. And Mr. Hughes and  
25 Mr. Kelley will have 15 minutes between them which

# Manual versus Automatic Processing of Completed Transactions



## Types of Error Messages Over Time





**Raw Data**  
**Types of Error Messages Over Time**  
**And Manual versus Automatic Over Time**

week	p	1p	csr	i	c	manual	automatic
1/11	0	1	0	23	2	6	21
1/18	0	0	0	3	0	0	0
1/25	0	21	5	3	10	29	2
2/1	0	14	4	29	2	13	8
2/8	4	129	15	41	6	117	15
2/15	6	18	5	19	5	16	52
2/22	53	45	20	50	26	49	98

p = pending  
 1p = Company processing error  
 csr = timed out waiting for csr  
 i = CLEC input  
 c = code type error

Error message are for all transactions.  
 Manual versus automatic is  
 completed transactions only.

H:\staff\aww\message